

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
EASTERN DIVISION**

**RICHARD BANKHEAD,  
PLAINTIFF,  
AMERICAN SUZUKI MOTOR CORP., et al.,  
DEFENDANT.**

**CASE NO.: 03: 07 CV208-MHT**

**PLAINTIFF'S RESPONSES TO DEFENDANT'S FIRST SET  
OF INTERROGATORIES**

1. Name: Richard E. Bankhead  
Date of Birth: [REDACTED]  
S.S.N.: [REDACTED]
2. Heather McKenzie  
222 Lee Road 282  
Salem, AL 36877
3. I had been working at Extreme Power Sports in Columbus, GA. I was employed at Extreme Power Sports at the time.
4. Byran Oschman  
  
G&B Customs  
1111 13<sup>th</sup> Street  
Columbus, GA 31901
5. Blue Cross Blue Shield (Health Insurance)  
  
Progressive Insurance (motorcycle)
6. No felony convictions
7. To my knowledge, I have never been a party to a lawsuit.
8. I received my high school diploma online through Rockville Online. I attended Smith's Station High School through 11<sup>th</sup> grade. I attended school in California in 8<sup>th</sup> grade and Mississippi in 9<sup>th</sup> grade. I lived with family due my mother's liver transplant.

9. I am not currently employed at this time. Prior to the accident, I was employed with Extreme Power Sports in Columbus, Georgia. My boss was Bryan Oschman.
10. The motorcycle was driven approximately 22 miles. Eleven of those miles had been a test drive.
11. Bryan Oschman  
Extreme Power Sports  
Columbus, GA  
  
G&B Customs  
1111 13<sup>th</sup> Street  
Columbus, GA 31901
12. The Plaintiff is the only individual to have custody of the motorcycle.
13. No
14. There have been no formal tests. I have let individuals at G&B view the motorcycle as well as Bryan Oschman.
15. The Plaintiff objects to this interrogatory as it calls for a legal conclusion in which Plaintiff is not qualified to answer or otherwise respond.
16. The Plaintiff objects to this interrogatory as it calls for a legal conclusion in which Plaintiff is not qualified to answer or otherwise respond.
17. The Plaintiff objects to this interrogatory as it calls for a legal conclusion in which Plaintiff is not qualified to answer or otherwise respond.
18. The Plaintiff objects to this interrogatory as it calls for a legal conclusion in which Plaintiff is not qualified to answer or otherwise respond.
19. No
20. Unknown at this time, Plaintiff will supplement this response when requested identities are ascertained or subject to the Court's Pre-Trial Order.
21. I suffered bodily injury and incurred medical bills. I suffered mental anguish and pain and suffering. My medical bills total approximately \$3,537.29.
22. The Plaintiff objects to this interrogatory as it calls for a legal conclusion in which Plaintiff is not qualified to answer or otherwise respond.

“/s/” Richard E. Bankhead  
Plaintiff

/s/ Stewart S. Wilbanks  
Attorney for Plaintiff  
Richard Bankhead

Of Counsel:

Stewart S. Wilbanks  
Dillard & Associates, LLC  
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CERTIFICATE OF SERVICE

I hereby certify that on August 20, 2007, I electronically filed the foregoing with the Clerk of the Court using the CMF/ECF system which will send notification of such filing to the following:

John D. Mayo  
Lightfoot, Franklin & White  
The Clark Building  
400 North 20<sup>th</sup> Street  
Birmingham, AL 35203

Respectfully submitted,  
/s/ Stewart S. Wilbanks  
Dillard & Associates, LLC  
2015 2<sup>nd</sup> Avenue North  
4<sup>th</sup> Floor  
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